

**UNITED STATES BANKRUPTCY COURT  
NEW JERSEY DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

**IN RE:  
MICHELLE LUGO**

**DEBTOR**

**CASE NO. 20-19144-ABA  
CHAPTER 13**

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND  
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING  
PROPERTY DESCRIBED AS 1 LIBERTY TRAIL, DELRAN, NJ 08075 AND THAT  
CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER  
\*\*\*\*\*4612**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Nicole Savage  
Brock and Scott, PLLC  
Attorneys at Law  
302 Fellowship Road  
Mount Laurel, NJ 08054  
njbkr@brockandscott.com

Freedom Mortgage  
10500 Kincaid Drive  
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

20-13322 BKOBJ01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Nicole Savage

Nicole Savage  
Attorney at Law (00033-2011)  
Brock & Scott, PLLC  
302 Fellowship Road  
Mount Laurel, NJ 08054  
844-856-6646  
704-369-0760  
njbkr@brockandscott.com

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on December 17, 2020 to the following:

MICHELLE LUGO  
1 LIBERTY TRAIL  
DELRAN, NJ 08075

Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107  
brad@sadeklaw.com

Isabel C Balboa, Bankruptcy Trustee  
Cherry Tree Corporate Center  
535 Route 38 - Suite 580  
Cherry Hill, NJ 08002

US Dept of Justice, US Trustee  
One Newark Center  
Ste 2100  
Newark, NJ 07102

/s/ Nicole Savage  
Nicole Savage  
Attorney at Law (00033-2011)  
Brock & Scott, PLLC  
302 Fellowship Road  
Mount Laurel, NJ 08054  
844-856-6646  
704-369-0760  
njbkr@brockandscott.com